STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY (360) 586-8203

CERTIFIED MAIL

July 8, 2016

Tim Haynes
Vice President/Mill Manager
Longview Operations
Weyerhaeuser Company
3401 Industrial Way
PO Box 188
Longview, WA 98632

Dear Mr. Haynes:

RE: 2016 Natural Gas Standard Inspection – Weyerhaeuser – Ostrander Pipeline (Insp. No. 6784)

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Natural Gas Standard Inspection from June 1 - 2, 2016, of Weyerhaeuser – Ostrander Pipeline. The inspection included a records review and inspection of the pipeline facilities.

Our inspection indicates one probable violation as noted in the enclosed report, which unless corrected, could potentially lead to future violation of state and/or federal pipeline safety rules.

Your response needed
Please review the attached report and respond in writing by August 10, 2016. The response should include how and when you plan to bring the probable violations into full compliance.

What happens after you respond to this letter?
The attached report presents staff's decision on probable violation and does not constitute a finding of violation by the commission at this time.

After you respond in writing to this letter, there are several possible actions the commission, in its discretion, may take with respect to this matter. For example, the commission may:

- Issue an administrative penalty under RCW 81.04.405; or

- Issue a complaint under RCW 81.88.040, seeking monetary penalties, changes in the company's practices, or other relief authorized by law, and justified by the circumstances. Any pipeline company that violates any pipeline safety provision of any commission order, or any rule in this chapter including those rules adopted by reference, or chapter 81.88 RCW is subject to a civil penalty not to exceed two hundred thousand dollars for each violation for each day that the violation persists. The maximum civil penalty for a related series of violations is two million dollars; or
- Consider the matter resolved without further commission action.

We have not yet decided whether to pursue a penalty or complaint in this matter. Should the commission decide to assess a penalty or initiate a complaint, your company will have an opportunity to respond and formally present its position.

If you have any questions or if we may be of any assistance, please contact Anthony Dorrough at (360) 664-1318. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

Alan E. Rathbun
Pipeline Safety Director

Enclosure

cc: Stefano Schnitger, Operations Manager, Weyerhaeuser Company
Robert L. Cosentino, Principal Consultant, Cosentino Consulting Inc.

UTILITIES AND TRANSPORTATION COMMISSION
2016 Natural Gas Pipeline Safety Inspection
Weyerhaeuser – Ostrander Pipeline

The following probable violation of Title 49 CFR Part 192 was noted as a result of the 2016 inspection of the Weyerhaeuser – Ostrander Pipeline. The inspection included a random selection of records, operation and maintenance (O&M), emergency response, inventory, and field inspection of the pipeline facilities.

PROBABLE VIOLATION

1. **49 CFR §192.615 Emergency Plans.**

   (b) Each operator shall:

   (2) Train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that the training is effective.

   Finding(s):

   A records review revealed that Weyerhaeuser could not provide documentation to support any emergency procedure training, or verification of the effectiveness of any emergency procedure training, i.e run tables or drills since the last audit.